IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

MARCIA MANTOOTH, as Representative of	§	
the Estate of JOHN MANTOOTH	§	CIVIL ACTION NO.
	§	A-08-CA-927-SS
	§	
	§	
V.	§	
	§	
BOARDWALK PIPELINE PARTNERS, L.P.;	§	
GULF SOUTH PIPELINE COMPANY, L.P.;	§	
TEXAS GAS TRANSMISSION, L.L.C.; ON	8	
AND OFFSHORE QUALITY CONTROL	8	
SPECIALIST, L.L.C.; AND ROGER	8	
HAYCRAFT	8	
	3	

DEFENDANT ON AND OFFSHORE QUALITY CONTROL SPECIALISTS, L.L.C.'S DESIGNATION OF POTENTIAL WITNESSES, EXPERT WITNESSES AND PROPOSED EXHIBITS

COMES NOW, On and Offshore Quality Control Specialists, L.L.C., Defendant in the above-styled action and, pursuant to the Court's April 29, 2009 Scheduling Order, files its designation of potential witnesses, expert witnesses and proposed exhibits.

I. Potential Witnesses

- Marcia Mantooth, individually and as Representative of the Estate of John Mantooth c/o Sean E. Breen Laura Tubbs Howry Breen, L.L.P. 1900 Pearl Street Austin, Texas 78705-5408
- 2. Eddie Hooks Jerry Allan Kris Wattinger 3809 S. First Street Austin, Texas 78767

3. Roger Haycraft

Daniel Mitchell

Tom Hodge, Construction Director

c/o J. Robin Lindley

Jared Gregory LeBlanc

Buck Keenan Gage Little & Lindley, LLP

700 Louisiana, 51st Floor

Houston, Texas 77002

4. Jill C. Reeves

Current address unknown, believed to reside in Oklahoma

5. Jim Parnell

ENGlobal Engineering, Inc.

6. Eddie McMillan

Current address unknown, believed to reside in Oklahoma

7. Dale Deverall

Current address unknown

II. Expert Witnesses

1. Martha S. Dickie

Bo Blackburn

Boone Almanza

Akin & Almanza

2301 S. Capital of Texas Hwy., Bldg. H

Austin, Texas 78746

Defendant reserves its right to supplement its designation of testifying and expert witnesses consistent with the Scheduling Order, any agreement between the parties, and the Federal Rules of Civil Procedure.

III. Proposed Exhibits

- 1. QCS 1-15 (QCS emails);
- 2. QCS 336 (Roger Haycraft email);
- 3. QCS 325 (Jill Reeves email);

- 4. QCS 326 (Jill Reeves email);
- 5. QCS 328-300 (Eddie Hooks email);
- 6. QCS 330 (Eddie Hooks email);
- 7. QCS 331 (Jill Reeves email);
- 8. QCS 332-335 (Jill Reeves email/statement);
- 9. QCS 340 (Eddie Hooks email);
- 10. QCS 342 (Haycraft email);
- 11. BWPP 1-7 (Boardwalk Inspection training);
- 12. QCS 488 (Boardwalk inspector list);
- 13. BWPP 21 (Boardwalk QA/QC Plan);
- 14. BWPP 213-438 (Inspector Handbook); and
- 15. QCS 516 (QCS Insurance Certificate).

Defendant reserves the right to supplement its exhibit list consistent with the Scheduling Order, any agreement between the parties, and the Federal Rules of Civil Procedure.

Respectfully submitted,

Martha S. Dickie

State Bar No. 00000081

Bo Blackburn

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ATTORNEYS FOR DEFENDANT ON AND OFFSHORE QUALITY CONTROL SPECIALIST, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the above and foregoing has been sent via the Court's electronic filing system to counsel of record, listed below on the 14th day of August, 2009:

Sean E. Breen Laura D. Tubbs Howry Breen, LLP 1900 Pearl Street Austin, Texas 78705

J. Robin Lindley 700 Louisiana, Suite 5100 Houston, Texas 77002

Bo Blackburn